

**TARTER KRINSKY & DROGIN LLP**

*Proposed Attorneys for Harold Adamo, Jr.*

*Debtor and Debtor-in-Possession*

1350 Broadway, 11<sup>th</sup> Floor

New York, New York 10018

(212) 216-8000

Scott S. Markowitz, Esq.

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----	X	
In re:	:	
	:	Chapter 11
HAROLD ADAMO, JR.,	:	
	:	Case No.: 14-73640
Debtor.	:	
-----	X	

**LOCAL BANKRUPTCY RULE 1007-4 AFFIDAVIT**

STATE OF NEW YORK     )  
                                  ss.:  
COUNTY OF NEW YORK    )

Harold Adamo, Jr., being duly sworn, deposes and states:

1. I am the debtor herein (the "Debtor") and I submit this affidavit pursuant to Rule 1007-4 of the Local Rules of this Court.
2. I intend to file a voluntary Chapter 11 petition with the clerk of this court on August 6, 2014.
3. There is no other or prior bankruptcy case filed by or against me.
4. There has not been a committee of creditors organized prior to the order for relief in this Chapter 11 case. This case is not a small business debtor within the meaning of § 101(51D) of the Bankruptcy Code.
5. I am filing this Chapter 11 case in order to obtain a breathing spell from the highly aggressive and over the top collection action taken by Rocco Marini and Josephine Marini

(the “Marinis”) who obtained a large judgment against me for in excess of \$11 million plus pre-judgment interest after a bench trial before the Honorable Joseph F. Bianco, U.S.D.J. The judgment stems from an alleged fraud which Judge Bianco found that I perpetrated on the Marini’s in connection with investments in rare coins. I strongly believe Judge Bianco’s decision was against the weight of the evidence and I am actively pursuing an appeal to the Second Circuit. In the meantime, as I cannot afford to bond the judgment, the Marinis have served approximately eighty (80) information subpoenas upon numerous of my business associates as well as my children’s schools and banks seeking to obtain information to enforce the judgment. The Marinis even went as far as to serve subpoenas on boutiques where my wife has either frequented or her friends own. These subpoenas included pictures of my children and sought information as to whether my family members have recently shopped at these stores. The Marini’s served information subpoenas and deposition notices on at least one of my neighbors and have recently interviewed at length, one of my neighbors, presumably seeking to find information which may lead to the discovery of assets. Counsel for the Marinis knows full well that I cannot possibly fully satisfy the judgment but is proceeding solely to harass and embarrass my family and myself and prevent me from making a living in the only field I have been working in for over thirty (30) years. I intend to utilize the chapter 11 process to afford me a breathing spell from this harassment pending the outcome of the appeal. If I am unsuccessful in obtaining relief from the Second Circuit, I am hopeful that the chapter 11 process with its required transparency will lead to a reasonable settlement based upon the pool of potential assets available to satisfy the judgment.

6. Attached hereto as **Exhibit “1”** is a list of my twenty (20) largest unsecured creditors, excluding insiders.

7. A list of my five (5) largest secured creditors is annexed hereto as **Exhibit 2**.
8. A list of my assets and liabilities will be filed within the next few days.
9. None of my properties are in the possession or custody of any public officer, receiver, trustee, pledgee, assignee of rents, liquidator, secured creditor, or agent of any such person.
10. I reside at 207 Benneyfield Drive, East Williston, New York 11596.
11. My assets consist primarily of my ownership interest in various family limited partnerships which own various parcels of real estate located in New York, including my primary residence. I also have a retirement account which is exempt from creditors.
12. Aside from the litigation referenced above, which has proceeded to a judgment, I am a named defendant in a recently filed fraudulent conveyance action which has been consolidated with the original litigation. In the fraudulent conveyance action, the Marini's are seeking to undo certain transfers of property to various family limited partnerships. To the best of my knowledge, I am not a party to any other litigation.
13. I intend to continue in the operation of my businesses and management of my property pursuant to the provisions of Chapter 11, Title 11 of the United States Code.

14. I am currently employed by Bullion Shark, LLC a limited liability company owned by my son Nicholas. To the extent funds are available, I receive a weekly salary of \$3,000. I expect to have cash disbursements of approximately \$12,000 in the next thirty days to pay my ordinary living expenses.

/s/ Harold Adamo, Jr.  
Harold Adamo, Jr.

Sworn to before me this  
6th day of August, 2014

/s/ Elizabeth Ellen Zaikowski  
Notary Public

Elizabeth Ellen Zaikowski  
Notary Public, State of New York  
No. 01ZA618127  
Qualified in Suffolk County  
Commission Expires January 28, 2016

B4 (Official Form 4) (12/07)

**EXHIBIT 1**  
**United States Bankruptcy Court**  
**Eastern District of New York**

In re Harold Adamo, Jr.

Debtor(s)

Case No. 14-73640Chapter 11

**LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS**

Following is the list of the debtor's creditors holding the 20 largest unsecured claims. The list is prepared in accordance with Fed. R. Bankr. P. 1007(d) for filing in this chapter 11 [or chapter 9] case. The list does not include (1) persons who come within the definition of "insider" set forth in 11 U.S.C. § 101, or (2) secured creditors unless the value of the collateral is such that the unsecured deficiency places the creditor among the holders of the 20 largest unsecured claims. If a minor child is one of the creditors holding the 20 largest unsecured claims, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See 11 U.S.C. § 112; Fed. R. Bankr. P. 1007(m).

(1) <i>Name of creditor and complete mailing address including zip code</i>	(2) <i>Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted</i>	(3) <i>Nature of claim (trade debt, bank loan, government contract, etc.)</i>	(4) <i>Indicate if claim is contingent, unliquidated, disputed, or subject to setoff</i>	(5) <i>Amount of claim [if secured, also state value of security]</i>
American Express PO Box 1270 Newark, NJ 07101	American Express PO Box 1270 Newark, NJ 07101	Credit Card Debt	Unliquidated	90,000.00
American Express Business PO Box 1270 Newark, NJ 07101	American Express Business PO Box 1270 Newark, NJ 07101	Business Debt	Unliquidated	18,000.00
Bank of America PO Box 45144 Jacksonville, FL 32232	Bank of America PO Box 45144 Jacksonville, FL 32232	Business Loan	Unliquidated	48,000.00
Black Card Visa PO Box 8801 Wilmington, DE 19899	Black Card Visa PO Box 8801 Wilmington, DE 19899	Credit Card Debt	Unliquidated	33,000.00
Chase Mastercard PO Box 15153 Wilmington, DE 19886	Chase Mastercard PO Box 15153 Wilmington, DE 19886	Credit Card Debt	Unliquidated	20,000.00
Citibank Mastercard PO Box 183071 Columbus, OH 43218	Citibank Mastercard PO Box 183071 Columbus, OH 43218	Credit Card Debt	Unliquidated	19,000.00
Rocco & Josephine Marini 11 Deep Woods Ct. Old Westbury, NY 11568	Rocco & Josephine Marini 11 Deep Woods Ct. Old Westbury, NY 11568	Judgment	Disputed	20,000,000.00
Schlam Stone & Dolan 26 Broadway New York, NY 10004	Schlam Stone & Dolan 26 Broadway New York, NY 10004	Legal Fees	Disputed	800,000.00
Sears Citibank MasterCard PO Box 183082 Columbus, OH 43218	Sears Citibank MasterCard PO Box 183082 Columbus, OH 43218	Credit Card Debt	Unliquidated	4,000.00

B4 (Official Form 4) (12/07) - Cont.

In re **Harold Adamo, Jr.**Case No. **14-73640**

Debtor(s)

**LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS**  
(Continuation Sheet)

(1)	(2)	(3)	(4)	(5)
<i>Name of creditor and complete mailing address including zip code</i>	<i>Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted</i>	<i>Nature of claim (trade debt, bank loan, government contract, etc.)</i>	<i>Indicate if claim is contingent, unliquidated, disputed, or subject to setoff</i>	<i>Amount of claim [if secured, also state value of security]</i>

**DECLARATION UNDER PENALTY OF PERJURY  
ON BEHALF OF A CORPORATION OR PARTNERSHIP**

I, **Harold Adamo, Jr.**, the debtor in this case, declare under penalty of perjury that I have read the foregoing list and that it is true and correct to the best of my information and belief.

Date **August 6, 2014**Signature **/s/ Harold Adamo, Jr.****Harold Adamo, Jr.**

Debtor

*Penalty for making a false statement or concealing property:* Fine of up to \$500,000 or imprisonment for up to 5 years or both.  
18 U.S.C. §§ 152 and 3571.

**EXHIBIT 2****IN THE UNITED STATES BANKRUPTCY COURT  
Eastern District of New York**-----X  
In re:

Chapter 11

HAROLD ADAMO, JR.,

Case No. 14-73640

Debtor.  
-----X**LIST OF CREDITORS HOLDING 5 LARGEST SECURED CLAIMS**

*Following is a list of the debtor's creditors holding the 5 largest secured claims. The list is prepared in accordance with Rule 1007-4(a)(vi) of the Local Rules of this court for the filing in this Chapter 11 case.*

<b><i>NAME OF CREDITORS AND COMPLETE MAILING ADDRESS (INCLUDING ZIP CODE)</i></b>	<b><i>NAME, TELEPHONE NUMBER AND COMPLETE MAILING ADDRESS (INCLUDING ZIP CODE) OF EMPLOYEE, AGENT, OR DEPARTMENT (IF DIFFERENT FROM MAILING ADDRESS) OF CREDITOR FAMILIAR WITH CLAIM</i></b>	<b><i>AMOUNT OF CLAIM</i></b>	<b><i>DESCRIPTION AND EST. VALUE OF COLLATERAL SECURING CLAIM</i></b>
Bank of the West P.O. Box 4024 Alameda, CA 94501	Bank of the West P.O. Box 4024 Alameda, CA 94501	\$72,000.00	Lien on 2014 Monterey 288SS Boat

**DECLARATION UNDER PENALTY OF PERJURY**

I, Harold Adamo, Jr., named as debtor in this case, declare under penalty of perjury that I have read the foregoing list of creditors holding the five (5) largest secured claims and that it is true and correct to the best of my information and belief.

Dated: New York, New York  
August 6, 2014

/s/ Harold Adamo, Jr.  
Harold Adamo, Jr.